



SADDLEWORTH

Parish Council

1. NETWORK RAIL STALYBRIDGE TO DIGGLE TWA ORDER

Saddleworth Parish Council supports in principle the improvements to the Transpennine Route through the parish towards Manchester and Leeds.

However, while the principle is supported, **there are a substantial number of concerns – specific and general – to which the Parish Council objects in the strongest possible terms, based on the significant impact on public access, impact on local businesses, health and safety, community and environmental impact.**

On that basis, we consider that substantial revisions to the proposals are required before we would support the proposals to see the TWA Order granted.

a. A670 closure

The proposals include the closure of the A670 at Greenfield for an estimated minimum of 16–20 weeks. Estimates from local engineers with experience of similar projects suggest that this is an optimistic minimum.

This road is the main access from Oldham to Saddleworth – in particular the villages of Uppermill, Greenfield, Diggle and Dobcross.

The proposals outline that agreement will be sought as part of the process to agree diversions to accommodate traffic during the works. It should be noted that as the work is to upgrade the bridge at Greenfield train station, which will be out of service, this will significantly increase the amount of traffic in the area for the duration of the works.

While we acknowledge the importance of the upgrade works to the station, particularly the access improvements to the Huddersfield-bound platform, the TWA Order proposal as it stands does not address our significant safety concerns, nor the commercial impact on the businesses in the area.

As outlined in the Saddleworth Neighbourhood Plan, the economy of Saddleworth has a great reliance on tourist trade, with a significant proportion of the businesses in Uppermill and Greenfield being small, independent businesses. A closure of a minimum of five months with no agreed traffic management in place will massively impact on those businesses, and many will be at significant risk of closure.

Specifically, Neighbourhood Plan policy 19: retail, commercial and industrial development states: “19.6 *There will be a strong presumption against the loss of commercial premises,*”, and policy 23: services states: “23.1 *Developments will be supported which make provision for or allow for the retention of key services within individual village centres, in particular supporting the model of 20-minute neighbourhoods.*”

While the proposal does not directly result in the loss of commercial premises, the significant disruption will put significant pressure on both commercial premises and the retention of key services in those village centres.



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Further, the A670 is the main access route for emergency vehicles, with the hospital serving the area being the Royal Oldham Hospital in Oldham town centre, the fire station being located further along the A670 at Mumps, and the police station being in the centre of Oldham. Diversions will at best cause significant delays to emergency vehicle access, particularly at peak times. Without planning in place to mitigate the impact, we consider that this could have a life-threatening impact.

It should also be noted that Saddleworth School is the only secondary school in the parish, and the removal of this footbridge for 16–20 weeks will have a significant impact on children's ability to get to and from school. Students attending the school from Grasscroft, Lydgate, Grotton, Springhead, Lees and beyond will be on the wrong side of the access, and will suffer extremely significant disruption in getting to school.

Saddleworth Parish Council considers that the plan should not go ahead without significant mitigation. Due to the topography of the location, it would be possible for a temporary "bailey" bridge to be constructed at this location over the top of the existing bridge, and for the work to then be carried out underneath.

If that alternative is not carried out, it is critical that before the TWA Order is granted, a full traffic management plan should be provided which demonstrates that there will not be any significant impacts on public safety (with active confirmation from the Greater Manchester Fire and Rescue Service, GMP and NWAS), or on the businesses in the area.

b. Moorgate Halt

The proposals include the closure of a current level crossing at Moorgate Halt (PRoW 209) which we are strongly against on the basis of 1) maintenance of existing public rights of way, and 2) public safety.

Planning permission for a new footbridge at this location already exists, with Network Rail applying successfully for this in 2022.

The levels of foot traffic at this location are significantly higher than those at locations elsewhere along the Transpennine Route Upgrade where Network Rail have implemented alternative access via footbridge, and the decision to remove access here is massively inconsistent with Network Rail's own approach.

The forthcoming Oldham Local Plan states under policy D1, *"11. ensure that: a) footpaths, entrances and shared circulation spaces are accessible and fit for purpose;"*. This is complemented by the forthcoming Saddleworth Neighbourhood Plan, which includes policy 25 on cycling, pedestrian and leisure infrastructure; paragraph 25.5) reads *"Developments will not be supported which reduce the quality or overall provision of existing rights of way. Should a development require the diversion of a public right of way, the provision of an alternative right of way which is through green spaces will be required."*

The proposal put forward by Network Rail clearly breaches this.

With regards to PRoW 244, Network Rail have not provided a disability impact assessment, as is required by their public sector equality duty under the Equalities Act 2010. Given the significant reservations of the footpaths officer with regards to the accessibility of PRoW 244, it is not considered that this is an acceptable alternative, and does not allow people with disabilities the same access to enable them to cross the railway.



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Further to this, the proposals from Network Rail will divert foot traffic via PRoW 244. This existing footpath has a steep route, is longer, and has been declared by Oldham Council's footpaths officer to be dangerous and unusable.

PRoW 244 exits on to the A670 at a point where there is a minimal footpath (below legal recommendations – around 12 inches wide). The main road at this point has high levels of traffic, which Saddleworth Parish Council, the Moorgate Footbridge Campaign Group, and surveys of the local community have all indicated as a significant safety risk.

Network Rail have acknowledged that it is not possible to mitigate this by extending the pavement due to the restrictions on the existing location, and suggested that it would need to be monitored by the Council, with the only possible and – in our opinion – insufficient mitigation being an increased 20mph zone.

Saddleworth Parish Council regard this risk as unacceptable, and a clear alternative must be found before granting the TWA Order. Given the extremely poor sightlines at this location, the lack of provision for people with disabilities, and it not being possible to mitigate the dangerous nature of this exit,

Policy HE2 of the forthcoming Oldham Local Plan states: *“Applications affecting heritage assets and their setting should be fully justified and accompanied by full information necessary to assess the impact of the proposals on the heritage asset. Proposals that affect heritage assets will require the submission of a Heritage Statement (which may form part of a Design and Access Statement) proportionate to the asset's significance.*

The statement should:

- a. describe the significance of the asset, including its setting;*
- b. assess the impact / identified harm the proposal has on its significance; and*
- c. provide clear and convincing justification for the proposed works that outweigh any identified harm.”*

The Moorgate Halt crossing is part of an ancient footpath which is understood to be over 1,000 years old, and as such a clear heritage asset.

The justification for this change from Network Rail is purely on a cost basis. However, the supporting evidence for this is extremely poor, and **Saddleworth Parish Council considers that it does not provide clear and convincing justification for the proposed works that outweigh any identified harm.**

Earlier proposals for this location included a footbridge at this location, which would allow for the continued use of this location. A similar footbridge at Barrowby Hill has been installed by Network Rail for a cost of approximately £2 million.

Network Rail have put forward proposals that suggest that the cost of the footbridge at this location would be £4.5 million, which is both inconsistent with the cost of other rail bridges, and – perhaps more significantly – contradicted by Network Rail's own figures.

In response to a Freedom of Information request, Network Rail provided the detail of their cost breakdown, which they have incorrectly added up. The FOI shows that the estimated cost of the rail bridge would be £2,972,000, which even allowing for the additional 16% risk figure provided by Network Rail, would be £1 million lower than the figure they have quoted. The claim that the footbridge option would cost £4.5 million is clearly incorrect and cannot be used to justify a decision.

This is an extremely significant discrepancy in the costs assigned to this project Saddleworth Parish Council regards this as a completely unsatisfactory justification for the approach taken, and considers



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that before the TWA Order is decided, a full explanation of this discrepancy provided, and the costings withdrawn and resubmitted correctly, as it could be clearly considered as negligent with the potential for future legal action if a decision was taken on the basis of the figures provided.

Network Rail have provided two sets of figures in response to Freedom of Information requests, and the stark disparity between the estimated costs back up our opinion that any decision based on the costs provided would be open to judicial review.

The project management cost suggested by Network Rail for the significant works proposed on PRoW 244 is £6,000. The project management cost provided by Network Rail for the footbridge proposal is £194,000. No justification or explanation for this extraordinary difference has been provided.

The construction of new steps and improvements to the walkway for PRoW 244 is estimated to cost £63,000. The closure of the level crossing and improvements to the footpath for the footbridge proposal is £584,000. No justification or explanation for this extraordinary difference has been provided.

The land requirement and cost to secure compound sites for PRoW 244 is estimated to cost £20,000. The access and land costs for the footbridge proposal is estimated at £435,000. No justification or explanation for this extraordinary difference has been provided.

While there could be some differences between the costs assigned to the proposals, there is clearly no justification for a 3,233% increase in project management costs, a 923% increase in the walkway improvements cost, and a 2,175% increase in land costs and access.

It is impossible to make an judgement on the accurate costs for either proposal based on the information provided by Network Rail, but what is absolutely clear is that the only justification provided for the closure of PRoW 209 – cost – does not add up, and can in no way overcome the equalities impact, the heritage impact, and the breaching of the planning policies in the forthcoming Local Plan and Neighbourhood Plan.

On this basis, our position is that the granting of the TWA Order is only justified with the provision that PRoW 209 is maintained, either through the provision of a new footbridge or an alternative safe crossing at this location.

c. Diggle access

The proposals include a significant diversion in Diggle, with access to part of the village being via a temporary route across a field.

The site for this temporary route is in an area which is subject to policy 5 of the forthcoming Neighbourhood Plan: character and quality of land adjacent to the National Park. The policy states that *“4.1 Development must respect the setting of the Peak District National Park (the indicative area adjacent to the National Park as shown in Map A, and appendix 1) by being sensitively located and designed so as to avoid or minimise adverse impacts on the National Park.”*

This is also referenced in the forthcoming Oldham Local Plan, policy OL1, which states: *“Development within the planning boundary of Oldham Borough must ensure it does not conflict with the purposes of the Peak District National Park taking into account views into and out of the park and sensitive design into the wider landscape.”*

“Development that is viewed as conflicting with the purposes of the national park will not be permitted.”



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There is nothing indicated in the proposals for the TWA Order to suggest that the approach respects that setting of the Peak District National Park, or is sensitively located and designed to avoid or minimise adverse impacts.

While the proposal is temporary, the development will take place over a period of a minimum of several months, and likely years, and thus we consider that the TWA Order must be revised to demonstrate how the proposals are compliant with the Neighbourhood Plan and Local Plan.

d. Compounds

There are 11 proposed compounds which are proposed in the plans for the TWA Order by Network Rail “to facilitate the storage of machinery and materials etc”.

In general terms, there is no mention in the proposals of what will happen to the compound areas when the works are finished. The proposals include the removal of mature trees in a number of locations, and works on areas of significant ecological importance.

In the forthcoming Saddleshworth Neighbourhood Plan, policy 1: green infrastructure states that developments should aim to: *“create or enhance existing green space, and replace any loss of green space with an equal or greater new provision of green space.”*

This complements policy N3 in the forthcoming Oldham Local Plan, which states *“Developments must: ... 6. demonstrate how existing trees and hedgerows and their health have been retained, wherever possible, through considerate careful siting and design, which avoids overshadowing of development;”*

Further, in the forthcoming Saddleshworth Neighbourhood Plan, policy 25: tourism and leisure states: *“21.5 Development proposals that will result in the loss or reduction in scale of a community facility will be resisted unless:*

- alternative facilities of equal or better accessibility, size and suitability are provided;*
- it can be demonstrated that the community facility is no longer viable.”*

Saddleshworth Parish Council consider that the TWA Order cannot be granted without a full proposal of how the impacts of the works can be offset by tree planting and works to mitigate the environmental and community impacts of the creation of the compounds. It should also be clear before the Order is granted what works are required to reinstate the compounds to their original state afterwards, and where green space or community facilities have been lost on a permanent basis, what provision will be made to replace them.

In addition, there are specific concerns about several of the compounds proposed in the TWA Order.

i. Armit Road

This site is in the green belt and is a Site of Biological Importance (SBI).

Policy N1 in the forthcoming Oldham Local Plan states: *“Sites designated for nature conservation and geodiversity will be protected from harm, in accordance with the following hierarchy, where the highest level of weight is given to international nature designations: ... 4. Locally designated sites including Sites of Biological Importance (SBI’s), taking into account their grade, ... Avoiding harm includes protecting biodiversity on site, whilst also avoiding harmful impacts to biodiversity outside the development site from*



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development. An ecological assessment must be submitted as part of the planning application where a site contains, adjoins or may impact on a site which contains nature as described in the above hierarchy."

Independent communication with Network Rail suggests that this is intended as a welfare compound, and that Network Rail "do not plan on frequently bringing heavy machinery in via this route". However, this is unclear and leaves open the possibility that land with an SBI designation could be subject to substantial works, as those plans could change, bringing a significant impact on the SBI.

Saddleshworth Parish Council request that the compound is designated as a welfare compound, and that a restriction on heavy machinery is at this location is set as a requirement for the TWA Order to be granted. An ecological assessment of the site should also be provided, which includes clear details of the use of the compound, how the SBI will be protected, and how any works adjacent which could impact the SBI will be mitigated, before the TWA Order is granted.

ii. Friezland Church Hall car park

This Church Hall is used as a community space for many activities, including a preschool, Brownies and Guides. The information does not state whether the Hall will have to be closed during the works, nor what the impact on these community facilities will be. The forthcoming Saddleshworth Neighbourhood Plan states in policy 21: tourism and leisure that "21.5 Development proposals that will result in the loss or reduction in scale of a community facility will be resisted unless: alternative facilities of equal or better accessibility, size and suitability are provided; or it can be demonstrated that the community facility is no longer viable." **On that basis, Saddleshworth Parish Council consider that the TWA Order should not be granted unless the proposals demonstrate how Network Rail will mitigate the impact caused by the closure of the car park on this community facility.**

iii. Saddleshworth Rugby Club car park

This location is the main car park for commuters using Greenfield Station to access Manchester or Greenfield. **Saddleshworth Parish Council considers that the TWA Order should ensure that this facility is used as a compound only while Greenfield Train Station is out of use, to ensure that there is enough parking provision for commuters when required. Similar to the Friezland Church Car park above, the proposals must also demonstrate how Network Rail will mitigate the impact of the compound on this community facility.**

iv. Carriageway off Oldham Road between Greenfield Station and Chapel Road

If this includes part of the adjoining banking it would mean removing a large stand of mature trees which are in the Green Belt. It should be noted that in both the forthcoming Local Plan for Oldham, and the forthcoming Saddleshworth Neighbourhood Plan, that any mature trees being removed must be replaced on a ratio dependent on the diameter of the trunk (see policy N4). **On that basis, Saddleshworth Parish Council contend that the TWA Order should only be granted on the basis that the mature trees are not to be removed, or that any that are, must be replaced at the appropriate ratio, in line with local planning guidance.**

v. Land off Ladcastle Road

This is shown as required for the works proposed on PRoW 244. This land is also in the Green Belt. **Saddleshworth Parish Council is strongly of the opinion that the TWA Order should only be granted with**



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the agreement of works to maintain PROW 209; on this basis, the works at this location would not be required, and thus this compound would not be required.

vi. Land adjacent to Uppermill Viaduct

Policy HE5: canals of the forthcoming Oldham Local Plan states: *“Proposed development that harms the setting or appearance of the canal will not be supported. Any new development should respect the canal frontage, ensuring active quality elevations, whilst respecting the unique character of the waterway and its associated heritage assets. Opportunities should be taken to improve the appearance and vitality of the canal side environment.”*

This compound lies in setting of the canal, surrounded by green belt, and with a significant role to play in the tourist economy of the area. **Saddleworth Parish Council consider that the TWA Order should only be granted if Network Rail can demonstrate how it will mitigate the impact of the compound on local businesses and the tourist economy.**

Concerns have also been raised with Saddleworth Parish Council with regards to the identification of bat roosts at this location. While Network Rail have acknowledged that there are bat roosts in this area, their exact location has not been identified through initial investigations by Network Rail. This investigation only sought to identify any potential bat roosts in the location of the works on the viaduct itself, but did not seek to identify any in the location of the compound. **Saddleworth Parish Council consider that more work is required to identify the location of the bat roosts to ensure that both the works on the viaduct, and the creation of the compound do not have an adverse impact on local bat populations.**

vii. Oaklands Road

The proposal intends to permanently expand the existing compound at this site. Oaklands Road is currently designated as an OPOL site (Other Protected Open Land – a local designation). It was not proposed that the site was redesignated as a Local Green Space on the basis that only part of the site was of ecological importance. It is also the case that there is a bank of mature trees at this location that the plans indicate will be removed. **On this basis, Saddleworth Parish Council is of the opinion that the TWA Order should not be granted without Network Rail demonstrating how it will mitigate the impact of the expansion of the compound on to the area of ecological importance, and without putting forward proposals to replace any trees removed on a proportionate basis as outlined in Oldham Local Plan policy N4.**

e. Provision of new facilities and services

The forthcoming Saddleworth Neighbourhood Plan expressly supports the improvement of the capacity and usage of the rail network in Saddleworth. Policy 27: public transport states *“27.2 Developments which would increase the capacity and usage of the rail network in Saddleworth will be supported, where they comply with other policy requirements, including the enhancement of Greenfield Station and the provision of additional stations in the Parish.”*

On that basis, Saddleworth Parish Council would support the TWA Order on the basis that the proposals demonstrate how they comply with the other policy requirements.

With regards to improving the capacity and usage of the rail network, the current proposals do not guarantee any improvement in the service provision for Saddleworth. Instead, this proposal will result in years of disruption for the whole parish – a population of 26,000 people, with the only clear benefit being



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improved accessibility at the station. While this has been a long-term goal of the Parish Council, the failure to provide any further benefits for the area and its people counts significantly against the consideration of the proposals. **Saddleworth Parish Council is therefore of the opinion that the proposals from Network Rail should demonstrate a concrete improvement in service standards. Currently, the proposals do not guarantee any increase in service to and from Manchester. We are strongly supportive of the proposals including a commitment to two stopping trains an hour from Greenfield to Manchester – one to Piccadilly and one to Victoria – and return services.**

We also have significant concerns on the parking and traffic arrangements directly adjacent to the train station. In particular, the proposals see the removal of a drop off point beside the station, and the introduction of a traffic crossing on Shaw Hall Bank Road. **Saddleworth Parish Council consider that the loss of accessible temporary parking next to the Station is a significant concern that should be addressed and must either be reinstated or mitigated by the proposals. We also consider that while a safe crossing option is a positive, there are questions with regards to its location on a road with a steep incline, near to a blind junction, and that there should be clearer confirmation from highways that this location is the best possible, or that the crossing should be sited at a more optimum location.**

f. Summary

The principle of the Transpennine Route upgrade is in line with Saddleworth Parish Council's vision for the area, as stated in its forthcoming Neighbourhood Plan.

The Neighbourhood Plan's vision statement says: *"Saddleworth will benefit greatly from its vital economic, social and environmental links with the rest of the Greater Manchester area, and also its strong connections to West Yorkshire. These neighbouring areas will continue to provide great opportunities for our residents, for instance, for employment and entertainment.*

"Likewise, the particular qualities which make Saddleworth such an asset to the North of England must be conserved and enhanced. The contribution which it will continue to make to the Peak District National Park is particularly noteworthy. Saddleworth's natural landscapes, its attractive and diverse villages, and its outstanding opportunities for a wide range of outdoor recreation are great strengths. These make Saddleworth a great place to live and visit, but they will also help to underpin its economic contribution.

"The tourism and leisure sector is an obvious example, but we envisage that other small and medium sized enterprises will make Saddleworth their base because of its excellent environment and its vibrant communities, and because highly skilled people will choose to live here."

Currently, Network Rail's proposals do not meet with that statement. We do consider that it is both financially viable and practically achievable to revise the proposals to ensure that they do. If Network Rail do amend their proposals to address the concerns we have laid out, we would be happy to support them.